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Attorneys for Plaintiff  
ONE-GO-EVENTS BENELUX BV

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ONE-GO-EVENTS BENELUX BV,

**ECF CASE**

Plaintiff,

- against -

07 Civ. 8185 (PKL)

JAM EXHIBITIONS, LLC,

Defendant.

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**AFFIRMATION OF JON WERNER IN OPPOSITION TO  
MOTION TO DISMISS AND IN SUPPORT OF CROSS-  
MOTION FOR LEAVE TO AMEND COMPLAINT**

JON WERNER, an attorney duly admitted to practice law before this Court,  
affirms the following under the penalties of perjury under 28 USC § 1746:

1. I am an attorney at law and an attorney with the firm of Lyons & Flood, LLP, attorneys for the plaintiff ONE-GO-EVENTS BENELUX BV ("One-Go-Events"). I have personal knowledge of the facts contained herein, unless otherwise stated upon information and belief. This Affirmation is respectfully submitted in opposition to defendant JAM EXHIBITIONS, LLC's ("JAM") motion to dismiss and in support of One-Go-Events' cross-motion for leave to amend its Complaint.

2. On September 19, 2007, One-Go-Events commenced this action by filing its Complaint, a copy of which is annexed hereto as Exhibit A.

3. On November 26, 2007, defendant JAM moved to dismiss One-Go-Events' Complaint, arguing, among other things, that the allegations in the Complaint were insufficiently plead to support a cause of action against JAM.

4. Accordingly, pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, plaintiff One-Go-Events, now cross-moves for leave to amend its Complaint, to cure the defects claimed by JAM and to add an additional cause of action against JAM for breach of the settlement agreement between JAM and One-Go-Events.

5. A copy of plaintiff's proposed Amended Complaint is annexed hereto as Exhibit B.

The foregoing is true and correct to the best of my knowledge under the penalty of perjury.

Executed on: December 20, 2007

  
Jon Werner

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